

LAW OFFICES OF G. KEVIN FASIC

Attorney at Law

1225 King Street, Suite 200 • Legal Arts Building • Wilmington, DE 19801
Telephone: (302) 654-4501 • Facsimile: (302) 654-4406 • E-Mail: k.fasic@lawgkf.com

September 12, 2006

The Honorable Joseph J. Farnan, Jr.
United States District Court
District of Delaware
844 North King Street,
Room 4124
Lock Box 27
Wilmington, DE 19801

**RE: Christine O'Donnell v. Inter-Collegiate Studies Institute
Civil Action No. 05-457 JJF
Our File No. 1117**

Dear Judge Farnan:

Accompanying this letter Your Honor will please find the Stipulation entered into by counsel to extend the dates in the Scheduling Order by a period of six (6) months, as well as an Amended Order reflecting the new dates. Counsel jointly and respectfully request that Your Honor sign the Amended Order.

Despite an ambitious intent to organize and complete discovery in a timely manner, a number of factors contributed to the need for additional time. First, there is the matter of a dispute concerning a protective order requested by defense counsel, which we are attempting to address without the involvement of the Court. Defense counsel also identified certain cost factors related to the discovery requested by plaintiff, which again we are endeavoring to resolve between counsel. These disputes have in no way impacted the courteous and professional interaction between counsel; if anything, the extension of courtesy and forbearance has been overly generous on both sides. Some delay has also been caused by competing schedules of counsel, and the current political campaign of my client, who is engaged in a primary contest for the United States Senate seat. Counsel are certain that we will be able to manage the discovery issues amongst ourselves, and to complete all necessary discovery within the modified schedule contained in the accompanying Scheduling Order.

Your Honor will also note the new letterhead on this correspondence, and the fact that the electronic filing is being made by defense counsel. I recently opened my own law practice and am having considerable difficulties with my computer systems. This has caused a delay in my ability to "e-file" documents, including the substitution of counsel. I hope to have the problems

The Honorable Joseph J. Farnan
September 12, 2006
Page Two

on my end resolved shortly, and to once again be able to function in the electronic filing system. I extend my apologies to the Court for any inconvenience this may cause, and my thanks to defense counsel for their willingness to assist me during this period.

Finally, the parties are presently scheduled for mediation before Magistrate Judge Thynge on October 11, 2006. Some discussions concerning settlement have occurred, and counsel are cautiously optimistic that the involvement of the Magistrate Judge will foster movement towards resolution of the dispute.

Should Your Honor have any questions about this request counsel will be available for a status conference, either by telephone or in Court, at Your Honor's direction. Please accept the thanks of counsel for consideration of this request.

Very truly yours,

LAW OFFICES OF G. KEVIN FASIC

By: 

G. Kevin Fasic, Esquire

GKF/jt
cc: Ms. Christine O'Donnell